

1 Lyliane S. Couture  
Larson Fowles, PLLC  
2 821 E. Broadway Ave, Ste 8  
Moses Lake, WA 98837  
3 (509) 765-6700  
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7 UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

8 UNITED STATES OF AMERICA, )

9 Plaintiff, )

10 vs. )

11 LUIS MANUEL FARIAS-CARDENAS, )  
*et al.*, )

12 Defendant. )

Case No.: 2:19-CR-00111-WFN-1

NOTICE OF APPEARANCE AND  
VERIFIED CLAIM

JURY DEMAND

CLERK'S ACTION REQUIRED

14 TO: Clerk of the Court; and

15 TO: Caitlin A. Baunsgard, Assistant United States Attorney and Counsel for  
16 Plaintiff; and

17 TO: Brian M. Donovan, Assistant United States Attorney and Counsel for  
18 Plaintiff.

19 PLEASE TAKE NOTICE that Lyliane S. Couture hereby appears as counsel  
20 of record for Claimant Maria de J. Farias. All future pleadings and correspondence,  
21

1 exclusive of original process, should be delivered to Ms. Couture at the following  
2 address:

3 Larson Fowles, PLLC  
4 821 E. Broadway Ave, Ste 8  
5 Moses Lake, Washington 98837

6 FURTHER, PLEASE TAKE NOTICE that Claimant Maria de J. Farias  
7 (“Claimant”), through her attorney, hereby claims an ownership interest in the  
8 defendant property in this matter, such claim being superior to that of the United  
9 States of America and equal to or superior to that of Luis Farias.

10 Claimant hereby specifically claims an ownership interest in the following real  
11 property:

12 1. The real property being forfeited is commonly known as Parcel #

13 121145000, Moses Lake, Washington, described as follows:

14 All that lot or parcel of land, together with its buildings, appurtenances,  
15 improvements, fixtures, attachments and easements, known as Parcel  
16 #121145000, Moses Lake, Washington, legally described as follows:

17 Lots 1 to 3 Block 2 Wheeler. Tax Parcel No. 121145000

18 See Exhibit 1

19 2. The real property being forfeited is commonly known as Parcel #

20 121146000, Moses Lake, Washington, described as follows:

21 All that lot or parcel of land, together with its buildings, appurtenances,  
improvements, fixtures, attachments and easements, known as Parcel  
#121146000, Moses Lake, Washington, legally described as follows:

Lots 4 Block 2 Wheeler . Tax Parcel No. 121146000

See Exhibit 2

3. The real property being forfeited is commonly known as 14929 NE 4<sup>th</sup>

Street, Moses Lake, Washington, described as follows:

All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, known as Parcel 14929 NE 4<sup>th</sup> Street, Moses Lake, Washington, legally described as follows:

Lots 5 & 6 Block 2 Wheeler

Tax Parcel No. 121147000 and 600437000

See Exhibit 3, Exhibit 4, and Exhibit 5

Claimant hereby demands restitution of said property in its entirety and demands the right to defend this action.

This claim is made on behalf of the Claimant by her attorney, the undersigned, who is duly authorized to make said claim.

DATED this 20 day of October, 2020.

LARSON FOWLES, PLLC

s/ Lyliane S. Couture

Lyliane S. Couture WSBA No. 32308  
Attorney for Claimant Maria de J. Farias  
Larson Fowles, PLLC  
821 E. Broadway Ave., Ste 8  
Moses Lake, WA. 98837  
Phone: (509) 765-6700  
Fax: (509) 765-6710  
Lyliane.c@gmail.com

**VERIFICATION**

STATE OF WASHINGTON )  
 ) ss.  
COUNTY OF GRANT )

I declare under penalty of perjury that the foregoing is true or correct.

DATED this 20<sup>th</sup> day of October, 2020.

*Maria de J. Farias*

Maria de J. Farias

EXHIBIT 1

1216713 06/11/2007 01:32 PM QCD  
 Page 1 of 1 R 32.00 Grant Co, WA  
 LUIS FARIAS

WHEN RECORDED RETURN TO:

Name: Luis M. Farias  
 Address: 14929 4th St. NE  
 City, State, Zip: Moses Lake WA 98832

REAL ESTATE EXCISE TAX	
AMT.	15.00
PEN	
P	
A	
I	
D	
AFF	192552
BY	<u>[Signature]</u>
DARRYL PHEASANT, TREASURER	

## QUIT CLAIM DEED

THE GRANTOR Emil Fatty, Jr.

for and in consideration of Lots 1, 2, 3 Block #2 wheeler plat  
 conveys and quit claims to Luis M. Farias

the following described real estate, situated in the County of GRANT, State of Washington, together with all after  
 acquired title of the grantor(s) hereir

Lots 1, 2, 3, Block #2 wheeler plat

Tax Account Number: 12-1145-000DATED 6/11/07

By

[Signature]

By

Luis M. Farias

STATE OF WASHINGTON )

COUNTY OF Grant )

SS.

On this day personally appeared before me  
Emil Fatty Jr. and Luis M. Farias  
 to me known to be the individual described in an d who  
 executed the within and foregoing instrument, and  
 acknowledged that they signed the same  
 as their free and voluntary act  
 and deed, for the uses and purposes therein mentioned.

GIVEN under my hand and official seal this  
 day of June 2007.

[Signature]  
 Notary Public in and for the State of Washington,  
 residing at Quincy, WA

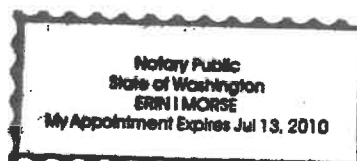


EXHIBIT 2

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Together with all and singular, the tenements, hereditaments and appurtenances thereunto belonging or in anywise appertaining, and whereas, Luis M Farias, by his legal representatives, has complied with the laws of the State of Washington, necessary to entitle him to a Deed to said real estate.

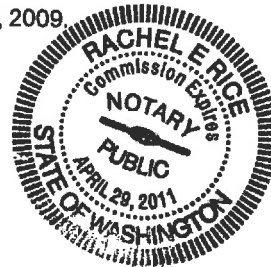
NOW THEREFORE, know ye, that I, Darryl Pheasant, Treasurer, of said County of Grant, State of Washington, in consideration of the promises and by virtue of the statutes of the State of Washington, in such cases provided hereby grant and convey unto Luis M Farias assigns forever, the said real estate herein before described in this instrument.

Given under by hand and seal of office this 29th day of September, 2009.

  
\_\_\_\_\_  
Treasurer of Grant County, Ephrata Washington

SUBSCRIBED AND SWORN TO BEFORE ME THIS this 29th day of September, 2009.

  
\_\_\_\_\_  
Notary Public in and for the State of Washington, Residing in Ephrata, Washington



1281353 09/29/2009 04:34 PM TRTD  
Page 2 of 2 R 03.00 Grant Co, WA  
GRANT COUNTY TREASURER



EXHIBIT 3

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Record at the Request of:  
Luis and Maria Farias  
PO Box 2177  
Moses Lake WA 98837-0577

REAL ESTATE EXCISE TAX	
AMT.	8191.25
PEN	
P	
A	
I	FEB 14 2001
D	
AFF	161440
BY	H. Baker
DARRYL PHEASANT, TREASURER	

GRANT COUNTY WASHINGTON

**WARRANTY FULFILLMENT DEED**

**THE GRANTORS, IRVING SHIPMAN and MARGAET H. SHIPMAN,**  
**husband and wife,** for and in consideration of TEN DOLLARS  
(\$10.00) and other valuable consideration, in hand paid, convey  
and warrant to **LUIS M. FARIAS and MARIA de J. FARIAS, husband**  
**and wife, GRANTEES** the following described real estate, situated  
in the County of Grant, State of Washington:

Lots 5 and 6, Block 2, Wheeler, according to the plat  
thereof recorded in Volume 1 of Plats, page 56, records of  
Grant County, Washington.

Grant County Treasurer Parcel Nos.: 12-1147-000

Physical Address: undeveloped

**SUBJECT TO:**

General taxes for the year 2001, in the amount of 39.94,  
which are due and payable but not delinquent until after  
April 30, 2001. (Tax Parcel No. 12-1147-000)

**WARRANTY FULFILLMENT DEED** 1

This deed is given in fulfillment of that certain Real Estate Contract between the parties hereto, dated February 12, 2001, and conditioned for the conveyance of the above described property, and the covenants of warranty herein contained shall not apply to any title, interest or encumbrance arising by, through or under the purchaser in said contract, and shall not apply to any taxes, assessments or other charges levied, assessed or becoming due subsequent to the date of said contract.

Irving Shipman  
IRVING SHIPMAN

*Margaret H. Shipman*  
MARGARET H. SHIPMAN

STATE OF WASHINGTON )  
 : ss.  
County of Grant )

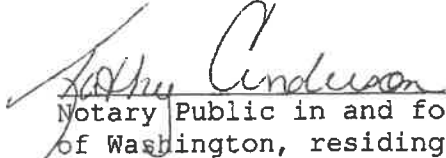
On this day personally appeared before me **IRVING SHIPMAN** and MARGARET H. SHIPMAN, to me known to be the individuals described in and who executed the within and foregoing instrument, and acknowledged that they signed the same as their

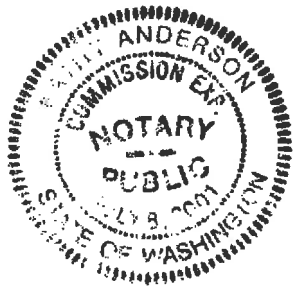
**WARRANTY FULFILLMENT DEED                      2**



free and voluntary act and deed, for the uses and purposes therein mentioned.

GIVEN under my hand and official seal this 12 day of February, 2001.

  
Notary Public in and for the State  
of Washington, residing at  
Moses Lake. My Commission  
Expires: 7/8/01



WARRANTY FULFILLMENT DEED 3

  
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Page: 3 of 3  
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EXHIBIT 4

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## Validated Copy of Record

Print date: 10/08/2020

Model Year 1977	Make STAL	Model 28/66	Body Style	Vehicle identification number (VIN) 7015	Scale Weight 0
Plate/Tag no N/A	Tab/Decal no N/A	Primary vehicle use type Mobile Home	Issue date	Exp date	
Plate/Tag no	Tab/Decal No	Vehicle use type	Issue date	Exp date	
Gross Weight	Gr wt start date	Gross weight exp date	Fleet no	Equip no	
Purchase Date 08-Oct-2020	Purchase Price 0.00				

Registered Owner

FARIAS, MARIA  
14929 4TH ST NE  
MOSES LAKE WA 98837-9511

Legal Owner

Same as Registered Owner

Brands/Comments: 24090/2001

*Anyone who knowingly makes a false statement may be guilty of a felony under state law and upon conviction shall be punished by a fine, imprisonment, or both.*

L0115223062

TD-420-802 (R/12/16) Page 1 of 2

Vehicle Information:	7015	1977	STAL	28/66
Filing	Title Filing			\$5.50
Service	Title Service Fee			\$15.00
Title	Manuf Home Title Transfer			\$15.00
	Vehicle Title Application			\$15.00

Fee Total: \$50.50

You can get a copy of this cash/fee receipt detail at [www.dol.wa.gov](http://www.dol.wa.gov).Skip a trip – go online [www.dol.wa.gov](http://www.dol.wa.gov)

EXHIBIT 5

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Page: 2 of 2  
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Grant Co Aud

031 PAGE 223

# Certificate of Marriage

State of Washington

County of GRANT

No 19636

This is to Certify that the undersigned a Catholic Priest by authority of a License bearing date the 26th day of JUNE A.D., 1998, and issued by the County Auditor of the County of GRANT, did on the 11th day of 7th A.D., 1998, at Royal City in the County of GRANT, State aforesaid join in lawful wedlock LUIS MANUEL FARIAS of the County of GRANT State of WASHINGTON and MARIA DEJESUS CERNA ORTEGA of the County of GRANT State of WASHINGTON with their mutual assent in the presence of Mazario Serna and Maribel Serna witnesses.

In Testimony Whereof, witness the signatures of the parties to said ceremony, the witnesses, and myself, this 11th day of 7th A.D., 1998.

SIGNATURES OF CONTRACTING PARTIES

Luis M. Farias 11-27-98 DATE OF BIRTH

Maria Dejesus Serna 11-27-98 DATE OF BIRTH

Mazario Serna WITNESS

Maribel Serna WITNESS

I hereby certify that the Certificate of Marriage was filed on 11-27-98 at 1:40 P.M. in book 051 on Page 223 of the Marriage License Book for the County of GRANT.

Dated this 13 day of November 1998.

William J. Vanoy County Auditor

NOTE: This Certificate must be returned to the County Auditor of the County in which the license was issued within thirty days from date ceremony was performed.

STATE OF WASHINGTON  
COUNTY OF GRANT JVS.

I, DAVID W. FIREBAUGH, COUNTY AUDITOR OF GRANT COUNTY OF THE STATE OF WASHINGTON, DO HEREBY CERTIFY THAT THE FOREGOING INSTRUMENT IS A TRUE AND CORRECT COPY OF THE ORIGINAL NOW OF RECORD IN THIS OFFICE. IN TESTIMONY WHEREOF I HAVE HEREUNTO SET MY HAND AND AFFIXED MY OFFICIAL SEAL THIS 13th DAY OF May 2011.

Laura Buchanan  
BY DEPUTY AUDITOR

